

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	:	CRIMINAL NO. <u>14-583</u>
v.	:	DATE FILED: <u>August 27, 2015</u>
<b>CORDERRO CODY,</b>	:	<b>VIOLATIONS:</b>
a/k/a "Gator,"	:	18 U.S.C. § 1594(c) (conspiracy to commit
a/k/a "Footz,"	:	sex trafficking by force, fraud or coercion - 1
a/k/a "Daddy"	:	count)
	:	18 U.S.C. 371 (conspiracy to transport
	:	individuals interstate to engage in
	:	prostitution - 1 count)
	:	18 U.S.C. § 1591 (sex trafficking by force,
	:	fraud, or coercion - 12 counts)
	:	18 U.S.C. § 1591 (sex trafficking of a minor –
	:	1 count)
		Notice of Forfeiture

**SECOND SUPERSEDING INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

1. From at least in or about 2009 continuing through in or about May 2014, in Allentown and Reading, in the Eastern District of Pennsylvania, and elsewhere, defendant

**CORDERRO CODY**

conspired and agreed together, and with others known and unknown to the grand jury, to knowingly recruit, entice, harbor, transport, provide, obtain and maintain by any means, in or affecting interstate commerce, women, knowing and in reckless disregard of the fact that force, threats of force, fraud, and coercion would be used to cause women to engage in commercial sex acts.

**MANNER AND MEANS**

It was part of the conspiracy that:

2. Defendant CORDERRO CODY, and Person #1, known to the Grand Jury, recruited women to perform commercial sex acts as part of CODY's "program;" his illegal commercial sex trafficking operation.

3. Defendant CORDERRO CODY used the website "backpage.com" to advertise women for commercial sex acts.

4. Defendant CORDERRO CODY took photographs of women to place in advertisements on "backpage.com."

5. "Johns" (men wanting to have sex with the recruited women) obtained commercial sex acts from the recruited women by calling a mobile telephone number placed in the backpage.com website advertisement and meeting the women at hotels designated and paid for by defendant CORDERRO CODY in and around Allentown, Whitehall, Reading, Scranton, Wilkes Barre, and Denver, Pennsylvania, and other locations including in New Jersey, New York, Maryland.

6. Defendant CORDERRO CODY received and kept most of the proceeds generated by the women engaging in commercial sex acts.

7. Defendant CORDERRO CODY used physical force and threats of physical force against women to cause or attempt to cause them to continue performing commercial sex acts.

8. Person #2, a taxi cab driver, known to the Grand Jury, transported women for commercial sex acts both intrastate and interstate, per defendant CORDERRO CODY's direction.

9. Defendant CORDERRO CODY used vehicles, public roadways, hotels, telephones and the Internet to facilitate commercial sex acts.

**OVERT ACTS**

In furtherance of the conspiracy and to accomplish its object, defendant CORDERRO CODY committed the following overt acts, among others, in the Eastern District of Pennsylvania:

1. In 2009 defendant CORDERRO CODY recruited AD to work for him performing commercial sex acts.
2. In 2009, defendant CORDERRO CODY recruited NG to work for him performing commercial sex acts.
3. Starting in 2009 through May 2014, defendant CORDERRO CODY assaulted AD on many occasions for not following the rules of his "program;" his commercial sex trafficking operation, including not performing prostitution "dates" when he demanded.
4. In or about July 2011, defendant CORDERRO CODY recruited BJ to work for him performing commercial sex acts.
5. In or about July 2011, defendant CORDERRO CODY physically assaulted BJ.
6. In or about July 2011, defendant CORDERRO CODY recruited CW to work for him as a prostitute.
7. In or about July 2011, defendant CORDERRO CODY physically assaulted CW.
8. In or about 2012, defendant CORDERRO CODY and Person #1 recruited CR to work for CODY performing commercial sex acts.
9. In or about 2012, defendant CORDERRO CODY physically assaulted NG.

10. On or about February 10, 2012, defendant CORDERRO CODY attempted to recruit BW to work for him performing commercial sex acts; when BW refused, defendant CODY stripped her naked and physically assaulted her.

11. In or about the Summer of 2012, defendant CORDERRO CODY recruited MG and KM to work for him performing commercial sex acts.

12. In or about the Summer of 2012, defendant CORDERRO CODY physically assaulted MG on several occasions.

13. In or about December 2012, defendant CORDERRO CODY using fraud and threatening means caused Victim #9 to engage in commercial sex acts.

14. In or about December 2012, defendant CORDERRO CODY threatened Victim #9 that if she stopped working for him, she would be harmed.

15. In or about early 2013, defendant CORDERRO CODY recruited RE to work as a prostitute and physically assaulted her several times for not following his rules

16. In or about early 2013, defendant CORDERRO CODY recruited Victim #10 to work as a prostitute.

17. In or about April 2013, defendant CORDERRO CODY physically assaulted Victim #10 for getting arrested for prostitution.

18. In or about November 2013 but no later than November 25, 2013, defendant CORDERRO CODY physically assaulted CR when she requested permission to go home to see her children for the Thanksgiving holiday.

19. In or about November 2013, defendant CORDERRO CODY recruited Person #2 to perform taxi cab services in furtherance of CODY's commercial sex trafficking operation.

20. Between November 2013 and May 2014, Person #2, at defendant CORDERRO CODY's direction drove AD, CR and others to various hotels in Allentown and Reading, Pennsylvania and Gaithersburg, Maryland.

21. On or about January 25, 2014, defendant CORDERRO CODY caused to be posted an advertisement on the website "backpage.com" advertising CR for commercial sex acts in Reading, Pennsylvania.

22. On or about January 29, 2014, defendant CORDERRO CODY caused to be posted an advertisement on the website "backpage.com" advertising CR for commercial sex acts in Reading, Pennsylvania.

23. On or about January 31, 2014, defendant CORDERRO CODY caused to be posted an advertisement on the website "backpage.com" advertising CR for commercial sex acts in Reading, Pennsylvania.

24. On or about February 2, 2014, defendant CORDERRO CODY posted or caused to be posted an advertisement on the website "backpage.com" advertising CR for commercial sex acts in Reading, Pennsylvania.

25. On or about February 27, 2014, defendant CORDERRO CODY posted or caused to be posted an advertisement on the website "backpage.com" advertising CR for commercial sex acts in Gaithersburg, Maryland.

26. In or about March 2014, defendant CORDERRO CODY transported MW to Allentown to engage in prostitution at his direction.

27. In or about March 2014, Person #2, at defendant CORDERRO CODY's direction, purchased a BMW vehicle in Person #2's name, to be used by CODY in furtherance of his commercial sex trafficking operation.

28. On or about March 16, 2014, defendant CORDERRO CODY posted or caused to be posted an advertisement on the website "backpage.com" advertising AD for commercial sex acts in New Jersey.

29. On or about March 16, 2014, defendant CORDERRO CODY posted or caused to be posted an advertisement on the website "backpage.com" advertising CR for commercial sex acts in New Jersey.

30. On or about March 23, 2014, defendant CORDERRO CODY raped and physically assaulted CR at the America's Best Value Inn, in Allentown, Pennsylvania.

31. On or about March 31, 2014, defendant CORDERRO CODY posted or caused to be posted an advertisement on the website "backpage.com" advertising CR for commercial sex acts in Queens, New York.

32. In or about March and April 2014, Person #2, permitted defendant CORDERRO CODY to have a mobile telephone used to facilitate CODY's commercial sex trafficking operation, linked to her personal mobile telephone account.

33. On or about April 1, 2014, defendant CORDERRO CODY posted or caused to be posted an advertisement on the website "backpage.com" advertising CR for commercial sex acts in Queens, New York.

34. On or about April 2, 2014, defendant CORDERRO CODY posted or caused to be posted an advertisement on the website "backpage.com" advertising CR for commercial sex acts in Queens, New York.

35. On or about April 3, 2014, defendant CORDERRO CODY posted or caused to be posted an advertisement on the website "backpage.com" advertising CR for commercial sex acts in Queens, New York.

36. On or about April 8, 2014, Person #2, at defendant CORDERRO CODY's direction, transported CR from Pennsylvania to a hotel in Gaithersburg, Maryland in furtherance of CODY's commercial sex trafficking operation.

37. On or about April 9, 2014, defendant CORDERRO CODY posted or caused to be posted an advertisement on the website "backpage.com" advertising CR for commercial sex acts in Gaithersburg, Maryland.

38. On or about April 16, 2014, defendant CORDERRO CODY posted or caused to be posted an advertisement on the website "backpage.com" advertising AD for commercial sex acts in New Jersey.

39. On or about April 17, 2014, defendant CORDERRO CODY posted or caused to be posted an advertisement on the website "backpage.com" advertising AD for commercial sex acts in New Jersey.

40. On or about April 25, 2014, defendant CORDERRO CODY assaulted NG, claiming NG did not follow his rules by keeping money from prostitution dates.

41. In or about Spring 2014, defendant CORDERRO CODY assaulted CR for not following his rules and trying to leave his "program" causing her to lose consciousness.

42. In or about Spring 2014, defendant CORDERRO CODY contacted MW to attempt to recruit MW into his "program."

43. In or about late April 2014, defendant CORDERRO CODY drove MW, against her will, from the Scranton, Pennsylvania area to Allentown, Pennsylvania and caused MW to engage in commercial sex acts for CODY's financial benefit; CODY told MW she couldn't go home until she made some money.

44. On or about April 27, 2014, defendant CORDERRO CODY posted or caused to be posted an advertisement on the website "backpage.com" advertising MW for commercial sex acts in Denver and Lancaster, Pennsylvania.

45. In or about Spring 2014, defendant CORDERRO CODY assaulted MW including hitting her in the face causing injury to her eye, a bloody lip and a loose tooth.

46. On or about May 4, 2014, defendant CORDERRO CODY attempted to prevent MW from leaving his vehicle to escape from him.

47. On or about May 7, 2014, defendant CORDERRO CODY posted or caused to be posted an advertisement on the website "backpage.com" advertising MW for commercial sex acts in Brooklyn, New York.

48. On or about May 7, 2014, defendant CORDERRO CODY posted or caused to be posted an advertisement on the website "backpage.com" advertising AD for commercial sex acts in Allentown, Pennsylvania.

49. On or about May 11, 2014, defendant CORDERRO CODY contacted NG and told NG, she owed him "bread" and "you're my property" and threatened to "fuck her up."

50. On or about May 20, 2014, defendant CORDERRO CODY caused AD to engage in commercial sex acts at the Red Roof Inn in Allentown, Pennsylvania.

51. On or about May 20, 2014, defendant CORDERRO CODY possessed four mobile devices, all used to promote his "program:" a Samsung Galaxy, a LG, a Kyocera and a Verizon.

All in violation of Title 18, United States Code, Section 1594(c).



**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. From at least in or about 2009 continuing through in or about May 2014, in the Eastern District of Pennsylvania, and elsewhere, defendant

**CORDERRO CODY**

conspired and agreed together, and with others known and unknown to the grand jury, to knowingly transport any individual in interstate commerce with intent that such individual engage in prostitution, in violation of Title 18, United States Code, Section 2421.

**MANNER AND MEANS**

It was part of the conspiracy that:

2. Paragraphs 2 through 9 of Count One of this indictment are incorporated here.

**OVERT ACTS**

In furtherance of the conspiracy and to accomplish its object, defendant CORDERRO CODY committed the following overt acts; among others, in the Eastern District of Pennsylvania, and elsewhere:

Overt Acts paragraphs 19, 20, 25, 27 through 29, 35 through 39, 47 and 51 of Count One of this indictment are incorporated here.

All in violation of Title 18, United States Code, Section 371.

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 2 through 9 and Overt Acts 2, 3, 20, 28, 38, 39, 48 and 50 of Count One of this indictment are incorporated here.

2. Beginning in 2009 and continuing to on or about May 20, 2014, in Allentown and Reading, in the Eastern District of Pennsylvania, and elsewhere, defendant

**CORDERRO CODY**

in and affecting interstate commerce, knowingly and intentionally recruited, enticed, harbored, transported, provided, obtained, and maintained, by any means, AD, knowing that force, threats of force, fraud, and coercion would be used to cause AD to engage in a commercial sex act, and attempted to do so.

In violation of Title 18, United States Code, Sections 1591(a) and 1594.

**COUNT FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 2 through 9 and Overt Acts 8, 18 through 25, 29, 30, 31, 33, 34 through 37, and 41 of Count One of this indictment are incorporated here.
2. Beginning in or about 2011 and continuing to on or about April 26, 2014, in Allentown and Reading, in the Eastern District of Pennsylvania, and elsewhere, defendant

**CORDERRO CODY**

in and affecting interstate commerce, knowingly and intentionally recruited, enticed, harbored, transported, provided, obtained, and maintained, by any means, CR, knowing that force, threats of force, fraud, and coercion would be used to cause CR to engage in a commercial sex act, and attempted to do so.

In violation of Title 18, United States Code, Sections 1591(a) and 1594.

**COUNT FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 2 through 9 and Overt Acts 26, 42 through 47 of Count One of this indictment are incorporated here.
2. Beginning in or about April 2014 and continuing to in or about May 2014, in Allentown, in the Eastern District of Pennsylvania, and elsewhere, defendant

**CORDERRO CODY**

in and affecting interstate commerce, knowingly and intentionally recruited, enticed, harbored, transported, provided, obtained, and maintained, by any means, MW, knowing that force, threats of force, fraud, and coercion would be used to cause MW to engage in a commercial sex act, and attempted to do so.

In violation of Title 18, United States Code, Sections 1591(a) and 1594.

**COUNT SIX**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 2 through 9 and Overt Acts 11 and 12 of Count One of this indictment are incorporated here.
2. Beginning in or about June 2012 and continuing to in or about August 2012, in Allentown and Reading in the Eastern District of Pennsylvania, and elsewhere, defendant

**CORDERRO CODY**

in and affecting interstate commerce, knowingly and intentionally recruited, enticed, harbored, transported, provided, obtained, and maintained, by any means, MG, knowing that force, threats of force, fraud, and coercion would be used to cause MG to engage in a commercial sex act, and attempted to do so.

In violation of Title 18, United States Code, Sections 1591(a) and 1594.

**COUNT SEVEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 2 through 9 and Overt Acts 4 and 5 of Count One of this indictment are incorporated here.
2. Beginning in or about July 2011 to in or about August 2011, in Allentown and Reading in the Eastern District of Pennsylvania, and elsewhere, defendant

**CORDERRO CODY**

in and affecting interstate commerce, knowingly and intentionally recruited, enticed, harbored, transported, provided, obtained, and maintained, by any means, BJ, knowing that force, threats of force, fraud, and coercion would be used to cause BJ to engage in a commercial sex act, and attempted to do so.

In violation of Title 18, United States Code, Sections 1591(a) and 1594.

**COUNT EIGHT**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 2 through 9 and Overt Acts 2, 9, 40 and 49 of Count One of this indictment are incorporated here.
2. Beginning in or about February 2010 and continuing intermittently to in or about April 2014, in Allentown and Reading in the Eastern District of Pennsylvania, and elsewhere, defendant

**CORDERRO CODY**

in and affecting interstate commerce, knowingly and intentionally recruited, enticed, harbored, transported, provided, obtained, and maintained, by any means, NG, knowing that force, threats of force, fraud, and coercion would be used to cause NG to engage in a commercial sex act, and attempted to do so.

In violation of Title 18, United States Code, Sections 1591(a) and 1594.

**COUNT NINE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 2 through 9 and Overt Act 10 of Count One of this indictment are incorporated here.
2. On or about February 10, 2012, in Allentown and Shillington in the Eastern District of Pennsylvania, and elsewhere, defendant

**CORDERRO CODY**

in and affecting interstate commerce, knowingly and intentionally recruited, enticed, harbored, transported, provided, obtained, and maintained, by any means, BW, knowing that force, threats of force, fraud, and coercion would be used to cause BW to engage in a commercial sex act, and attempted to do so.

In violation of Title 18, United States Code, Section s 1591(a) and 1594.



**COUNT TEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 2 through 9 and Overt Acts 6 and 7 of Count One of this indictment are incorporated here.
2. In or about July 2011, in Whitehall and Allentown in the Eastern District of Pennsylvania, and elsewhere, defendant

**CORDERRO CODY**

in and affecting interstate commerce, knowingly and intentionally recruited, enticed, harbored, transported, provided, obtained, and maintained, by any means, CW, knowing that force, threats of force, fraud, and coercion would be used to cause CW to engage in a commercial sex act, and attempted to do so.

In violation of Title 18, United States Code, Section s 1591(a) and 1594.

**COUNT ELEVEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 2 through 9 and Overt Acts 13 and 14 of Count One of this indictment are incorporated here.
2. In or about December 2012, in Allentown and Reading in the Eastern District of Pennsylvania, and elsewhere, defendant

**CORDERRO CODY**

in and affecting interstate commerce, knowingly and intentionally recruited, enticed, harbored, transported, provided, obtained, and maintained, by any means, Victim #9, knowing that force, threats of force, fraud, and coercion would be used to cause Victim #9 to engage in a commercial sex act, and attempted to do so.

In violation of Title 18, United States Code, Section s 1591(a) and 1594.

**COUNT TWELVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 2 through 9 and Overt Acts 16 and 17 of Count One of this indictment are incorporated here.

2. In or about early 2013 to in or about early 2014, in Allentown and Reading in the Eastern District of Pennsylvania, and elsewhere, defendant

**CORDERRO CODY**

in and affecting interstate commerce, knowingly and intentionally recruited, enticed, harbored, transported, provided, obtained, and maintained, by any means, Victim #10, knowing that force, threats of force, fraud, and coercion would be used to cause Victim #10 to engage in a commercial sex act, and attempted to do so.

In violation of Title 18, United States Code, Section s 1591(a) and 1594.

**COUNT THIRTEEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 2 through 9 and Overt Act 15 of Count One of this indictment are incorporated here.
2. In early 2013, in Allentown and Reading in the Eastern District of Pennsylvania, and elsewhere, defendant

**CORDERRO CODY**

in and affecting interstate commerce, knowingly and intentionally recruited, enticed, harbored, transported, provided, obtained, and maintained, by any means, RE, knowing that force, threats of force, fraud, and coercion would be used to cause RE to engage in a commercial sex act, and attempted to do so.

In violation of Title 18, United States Code, Section s 1591(a) and 1594.

**COUNT FOURTEEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 2 through 9 and Overt Act 11 of Count One of this indictment are incorporated here.
2. In or about the Summer of 2012, in Allentown in the Eastern District of Pennsylvania, and elsewhere, defendant

**CORDERRO CODY**

in and affecting interstate commerce, knowingly and intentionally recruited, enticed, harbored, transported, provided, obtained, and maintained, by any means, KM, knowing that force, threats of force, fraud, and coercion would be used to cause KM to engage in a commercial sex act, and attempted to do so.

In violation of Title 18, United States Code, Section s 1591(a) and 1594.

**COUNT FIFTEEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 2 through 9 of Count One of this indictment are incorporated here.
2. In or about July 2008 to in or about December 2008, in Allentown, in the Eastern District of Pennsylvania, and elsewhere, defendant

**CORDERRO CODY**

in and affecting interstate commerce, knowingly recruited, enticed, harbored, transported, provided and obtained by any means, a minor, BW, knowing that BW had not attained the age of 18 years and knowing that BW would be caused to engage in a commercial sex act, and attempted to do so.

In violation of Title 18, United States Code, Sections 1591(a) and 1594.

**NOTICE OF FORFEITURE**

**THE GRAND JURY FURTHER CHARGES THAT:**

As a result of the violations of Title 18, United States Code, Section 1591(a) and 1594(c) and (d), set forth in this indictment, defendant

**CORDERRO CODY**

shall forfeit to the United States of America any property, real or personal, that was used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the violation of Title 18, United States Code, Sections 1591(a), and 1594(a)(c), or any property, real or personal, constituting or derived from, any proceeds that were obtained, directly or indirectly, as a result of such violation, as charged in this indictment.

All pursuant to Title 18, United States Code, Section 1594(d).

**A TRUE BILL:**

---

**GRAND JURY FOREPERSON**

  
**ZANE DAVID MEMEGER**  
United States Attorney